IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JOSLYNN TERRELL, Individually and as Representative of the Estate of JAMAAL R. VALENTINE, Deceased; ANGELA BUTLER, as next friend of J.V. and JA.V., Minors; and CRYSTAL TRUITT, as next friend of S.M., a Minor	§	
Plaintiffs	§	
	§	
v.	§	**CIVIL ACTION NO. 3:11-cv-229**
	§	
CITY OF LA MARQUE, TEXAS; RICHARD GARCIA; FOREST GANDY; and MIKE KELEMAN	§	
Defendants	§	

JOINT MOTION TO EXTEND THE REINSTATEMENT DEADLINE BY SIXTY (60) DAYS

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

PLAINTIFFS, JOSLYNN TERRELL, Individually and as Representative of the Estate of JAMAAL R. VALENTINE, Deceased; ANGELA BUTLER, as next friend of J.V. and JA.V., Minors; and CRYSTAL TRUITT, as next friend of S.M., a Minor, by counsel, and Defendants, the CITY OF LA MARQUE, TEXAS; RICHARD GARCIA; FOREST GANDY; and MIKE KELEMAN, by counsel, jointly move this Court to extend the current reinstatement deadline by sixty (60) days.

In its Order on October 3, 2012, the Court dismissed the case from its docket with leave to reinstate "within sixty (60) days upon presentation of adequate proof that the settlement could not be perfected." DN 54.

The parties continue working to consummate the settlement, but require additional time in order to resolve issues related to the structuring of settlements for the minor children.

Extending the deadline by an additional sixty (60) days should allow the parties sufficient time to resolve these issues and complete the settlement so that reinstatement is not required.

A proposed order is attached for the Court's consideration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November, 2012, a true and correct copy of this document was sent electronically through the CM/ECF system in accordance with the Federal Rules of Civil Procedure to the following counsel of record:

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